

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
GAINESVILLE DIVISION

BOBBI JO WILLIAMS and
JUSTIN WILLIAMS,
Plaintiffs

Civil Action # 2:10-CV-0234-WCO

Vs

LDG FINANCIAL SERVICES, LLC
Defendant

ANSWER TO PLAINTIFF'S COMPLAINT

Comes now LDG FINANCIAL SERVICES, LLC hereinafter LDG defendant in the above styled complaint and files this their answer to the above styled complaint pursuant to Fed R. Civ. P.8 and 12.

1.

Responding to paragraphs 2 and 3 of plaintiff's complaint, Defendant admits to the jurisdiction and venue in this matter.

2.

Responding to paragraphs 4,5,6, of plaintiff's complaint. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the averments alleged.

3.

Responding to paragraphs 16,17,18,19,20,21,22,23,24,25,26,27,28 denies the allegations as alleged in plaintiff's complaint.

4.

Plaintiff's complaint fail to state a claim upon which relief can be granted.

5.

Plaintiff's damages if any were not caused by defendant.

6.

At all times germane defendant through its employees, have acted in good faith without malice or intent to injury plaintiff.

7.

Defendant at all times pertinent, has directed and supervised its employees to comply with the provisions of the Fair Debt Collection Act.

WHEREFORE, having fully answered or otherwise responds to plaintiffs complaint Defendant frays as follows:

(1) Plaintiffs complaint be dismissed in its entirety and with prejudice, with all cost taxed against plaintiff;

(2) Defendant recover from plaintiff its expense of litigation, including attorney fees.

(3) That defendant recover such other and additional relief as this Court deems just and appropriate.

This date January 19, 2011

William D. Smith
William D. Smith
Georgia Bar #664650

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